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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ANDREA NICOLE COSTELLO, an  
individual,

Plaintiff,

vs.

GLEN WOOD COMPANY d/b/a WOOD  
BROTHERS RACING, a foreign corporation;  
TRAVIS ALEXANDER, an individual; DOE  
Individuals 2–10; DOE Employees 11–20; and  
ROE Corporations 22–30,

Defendant.

GLEN WOOD COMPANY d/b/a WOOD  
BROTHERS RACING,

Third-Party Plaintiff,

vs.

NEVADA SPEEDWAY LLC; and FOES  
I through V and ZOE Corporations VI  
through X, inclusive.

Third-Party Defendant.

TRAVIS ALEXANDER,

Third-Party Plaintiff,

vs.

NEVADA SPEEDWAY LLC; and FOES  
I through V and ZOE Corporations VI  
through X, inclusive.

Third-Party Defendant.

Case No. 2:19-cv-01752-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS/THIRD-  
PARTY PLAINTIFFS TRAVIS  
ALEXANDER AND GLEN WOOD  
COMPANY D/B/A WOOD BROTHERS  
RACING’S TIME TO FILE RESPONSE  
TO PLAINTIFF’S FIRST MOTION IN  
LIMINE and TO EXTEND TIME TO  
FILE ADDITIONAL MOTIONS IN  
LIMINE**

1 COME NOW, Plaintiff ANDREA NICOLE COSTELLO (“Plaintiff Costello”) and  
2 Defendant/Third-Party Plaintiff Travis Alexander (“Alexander”), Defendant/Third-Party Plaintiff  
3 Glen Wood Company d/b/a Wood Brothers Racing (“Wood Brothers”) and Third-Party  
4 Defendants, Nevada Speedway, LLC (“NV Speedway”) by and through their respective  
5 undersigned counsel of record, and hereby submit their stipulation and proposed order to extend  
6 Alexander and the Wood Brothers’ time to respond to Plaintiff Costello’s First Motion in  
7 Limine and to extend the time to file additional motions in limine.

8 The jury trial in this matter was previously set to begin on November 1, 2021. However,  
9 the trial has now been rescheduled to begin on March 22, 2021 [see ECF No. 116]. In addition,  
10 the Parties anticipate the Court will issue its ruling on Defendant Alexander and Wood Brother’s  
11 Motion for Summary Judgment (“MSJ”) [ECF No. 80], for which Defendants submitted a  
12 supplemental brief on October 12, 2021 [ECF No. 117] and Plaintiff Costello will submit by  
13 October 21, 2021.

14 The Parties anticipate that the Court’s ruling on the MSJ may affect the Parties’  
15 presentation of evidence at trial, including the motions in limine they may file in preparation. In  
16 addition, prior to the trial being rescheduled to March 22, 2021, Plaintiff Costello submitted her  
17 Motion in Limine No. 1 to Exclude Irrelevant Evidence (“Plaintiff’s MIL 1”) [ECF No. 109] on  
18 October 1, 2021.

19 Based on the foregoing reasons, IT IS HEREBY STIPULATED that Defendant  
20 Alexander Wood Brothers’ Response to Plaintiff’s MIL 1 be extended to February 18, 2022.

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IT IS FUTHER STIPULATED that the deadline to file additional motions in limine be extended to February 18, 2022.

Dated this 15<sup>th</sup> day of October, 2021.

Dated this 15<sup>th</sup> day of October, 2021.

COGBURN LAW

TYSON & MENDES LLP

/s/ Joseph J. Troiano

/s/ Christopher A. Lund

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*Plaintiff Glen Wood Company d/b/a Wood*  
*Brothers Racing*

Dated this 15<sup>th</sup> day of October, 2021.

FENNEMORE CRAIG, P.C.

/s/ Patrick J. Sheehan

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*Attorneys for Third Party Defendants*

### **ORDER**

Based upon the foregoing Stipulation of the parties hereto, and good cause appearing therefore:

IT IS HEREBY ORDERED that Defendant/Third-Party Plaintiff Travis Alexander And Defendant/Third-Party Plaintiff Glen Wood Company d/b/a Wood Brothers Racing's Response to Plaintiff's Motion in Limine No. 1 to Exclude Irrelevant Evidence [ECF No. 109] be extended to February 18, 2022.

1 IT IS FUTHER ORDERED that the deadline to file additional motions in limine be  
2 extended to February 18, 2022.

3 IT IS SO ORDERED.

4 Dated this 21st day of October, 2021.

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8 UNITED STATES DISTRICT JUDGE  
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